

1 Pamela M. Egan, WSBA No. 54736  
2 POTOMAC LAW GROUP PLLC  
2212 Queen Anne Blvd., #836  
Seattle, WA 98109  
3 Telephone: (415) 297-0132  
Fax: (202) 318-7707  
4 Email: [pegan@potomaclaw.com](mailto:pegan@potomaclaw.com)  
Attorneys for Mark D. Waldron, Chapter 7 Trustee

6 **UNITED STATES BANKRUPTCY COURT**  
7 **EASTERN DISTRICT OF WASHINGTON**

8 In re:

9 GIGA WATT, Inc., a Washington  
10 corporation,  
Debtor.

Case No. 18-03197-FPC

The Honorable Frederick P. Corbit

Chapter 7

11 **NOTICE OF TRUSTEE'S**  
12 **MOTION FOR AUTHORITY TO**  
13 **PAY EXPENSES INCIDENT TO**  
14 **DISCOVERY IN PERKINS**  
**ADVERSARY PENDING**  
**SETTLEMENT NEGOTIATIONS**

15 PLEASE TAKE NOTICE that Mark D. Waldron, as the Chapter 7 Trustee  
16 ("Trustee"), has filed the *Trustee's Motion for Authority to Pay Expenses Incident*  
17 *to Discovery in Perkins Adversary Pending Settlement Negotiations* in the above-  
18 captioned case. The Motion seeks permission to pay \$7,100 in expenses incident  
19 to fact discovery in the adversary proceeding, *Waldron v. Perkins Coie, et al.*,  
20 pending in this case, as Adv. Proc. No. 20-80031 ("Perkins Adversary").

21 Specifically, \$1,400 will be paid to Lighthouse, Inc. for electronic document

22 NOTICE OF TRUSTEE'S MOTION FOR  
23 AUTHORITY TO PAY EXPENSES INCIDENT  
24 TO DISCOVERY IN PERKINS ADVERSARY  
PENDING SETTLEMENT NEGOTIATIONS – Page 1

1 extraction and \$6,600 will be paid to Lexbe, Inc. for storing and managing  
2 documents in a database. In addition, the Trustee is seeking permission to pay  
3 \$500 to LexBe, Inc. to “hibernate” the Lighthouse document database pending  
4 settlement negotiations in the adversary proceeding, *Waldron v. Perkins, et al.*,  
5 Case No. 2:20-ap-80031 and the WTT Token class action proceeding, *Dam v.*  
6 *Perkins, et al.*, Case No. 2:20-cv-00464.

7 **If you wish to object to the Motion, you must file an Objection with the**  
8 **Bankruptcy Court and serve the objection upon undersigned counsel by April**  
9 **28, 2023. The Court may enter an order granting the Motion without an**  
10 **actual hearing or further notice unless a written objection is timely served**  
11 **and filed.** If an objection is received, then a hearing will be set and notice of that  
12 hearing will be provided.

13 DATED this 3rd day of April 2023.

14 POTOMAC LAW GROUP PLLC

15  
16 By: /s/ Pamela M. Egan  
17 Pamela M. Egan (WSBA No. 54736)  
18 2212 Queen Anne Blvd.  
19 Seattle, WA 98109  
20 Tel.: (415) 297-0132  
21 Fax.: (202) 318-7707  
22 E: [pegan@potomaclaw.com](mailto:pegan@potomaclaw.com)

23 *Attorneys for Mark D. Waldron,*  
24 *Chapter 7 Trustee*

25  
22 NOTICE OF TRUSTEE’S MOTION FOR  
23 AUTHORITY TO PAY EXPENSES INCIDENT  
24 TO DISCOVERY IN PERKINS ADVERSARY  
25 PENDING SETTLEMENT NEGOTIATIONS – Page 2